UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Winston-Salem Division

IN RE: Youth/Adult Care Management Inc., Debtor(s).	Case No. B 10-52274 C-7
YOUTH / ADULT CARE MANAGEMENT, INC., and CHARLES M. IVEY III, CHAPTER 11 TRUSTEE FOR YOUTH / ADULT CARE MANAGEMENT, INC., Plaintiff, V. PIEDMONT BEHAVIORAL HEALTHCARE AKA "PBH"; Defendant.	Adversary No. A -11-6008

MOTION FOR EMERGENCY HEARING
ON SHORTENED NOTICE

NOW COMES the above captioned Debtor respectfully requesting an Emergency Hearing on Shortened Notice and, in support thereof, shows unto the Court the following:

1. The above captioned Debtor filed a voluntary petition under Title 11, Chapter 11 of the United States Bankruptcy Code on December 8, 2010. Said Debtor operated as a Debtor-in-Possession until January 25, 2011. Pursuant to Court Order, on January 25, 2011, Charles M. Ivey, III has been appointed and is the duly appointed, qualified and acting Chapter 11 Trustee.

2. On January 25, 2011, the Trustee caused the Debtor to file a complaint against Piedmont Behavioral HealthCare ("PBH") requesting, among other things, a declaratory judgment, an immediate turnover of funds, and a hearing to adequately protect the interests of PBH. The allegations and facts contained in the Complaint are incorporated herein by reference in support of this Motion.

3. If the Debtor is not able to obtain the interim relief requested concerning the turnover of withheld funds, the Debtor will be unable to meet its payroll on Friday, January 28, 2011. If the Debtor cannot meet its payroll, it can reasonably expect its employees to quit. As a result of that reasonable expectation, if the Debtor is not able to fund its payroll, it must take immediate action to transfer its patients to another capable facility. The patient transfer will cause this case to be converted to a Chapter 7 proceeding.

4. If the Debtor is able to obtain the funds requested and, among other things, meet its payroll, it should be in a position to continue operating and pay its expenses as they accrue in the ordinary course of business. The Trustee is negotiating with a prospective buyer. This funding will allow for these negotiations to move forward.

5. Given the urgency for the need of the funds as stated herein, time is of the essence and, therefore, the Debtor, by and through the Trustee, is requesting that Court hold an expedited hearing at 10:00 o'clock a.m. on Thursday, January 27, 2011 at the Venable Center, Dibrell Building - Suite 280, 302 East Pettigrew Street, Durham, North Carolina to consider the Debtor's Motion for Turnover of Funds and the adequate protection to be granted.

WHEREFORE, the Trustee respectfully requests that the Court enter an immediate Order scheduling a hearing on the matters indicated herein for January 27, 2011.

Respectfully submitted, this the 26th day of January, 2011.

/s/ Charles M. Ivey, III
Charles M. Ivey, III
Chapter 11 Trustee
NCSB #8333
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/s/ Edwin H. Ferguson, Jr.
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